

Response by The Isleworth Society – October 2024

Regulation 19 Hounslow Local Plan Consultation Response

Response to Consultation on Hounslow's Regulation 19 Consultation on the Single Local Plan at

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- Response by email to spp@hounslow.gov.uk by Tuesday 12 November 2024

General Comments on Accessibility

- Complexity, length and technical detail of Council consultation documents, including The Local Plan (at 500 pages) puts them out of reach for the vast majority of Hounslow residents to engage with. It is not a true consultation under these circumstances.
- TIS urge the Council to issue short (eg. 2-10 pages) summary versions of all public consultation documents which identify key issues for comment – in a question-based format that local residents can engage with to give their views in a quick and easy way. With the complete technical documents available as an annex. For example, do you agree that The Local Plan should 'seek to maximise the supply of housing in the Borough'?
- TIS responded on the Climate Change Mitigation and Adaptation consultation June 2023. This was a very technical document designed for property developers rather than local residents and yet some issues were of public interest, for example, homes with windows that don't open. No follow-up has been received in response to TIS consultation response.
- The <https://talk.hounslow.gov.uk/local-plan-reg19> webpage would be more accessible if there could be an explanation and over-view of the Local Plan process to date. Including links to consultation responses received in response to reg 18 consultation and how The Local Plan fits with the National Planning Framework and London Plan, linked accordingly. TIS suggest you ask respondents for permission for consultation responses to be made publicly available when they submit their response.
- All policy documents, guidance documents, and definitions, including Supplementary Planning Documents that are cited within The Local Plan and other consultations, need to be contained within documents themselves. If they are not included it will be too easy for individual projects, developers and for Planning Officers to dismiss them or misinterpret them.

Regulation 19 consultation: TIS comments

This Consultation response is submitted under policy headings, with an overall summary, below.

Summary

There are fundamental flaws in The Local Plan which makes the document Not Sound.

The structure of the document comprises separate, siloed policies. For example, the policy to **maximise the supply of housing in the Borough** has detailed housing targets and sits alongside, but not integrated, with policies to protect and enhance the environment (for example allotment provision) which do not have equivalent fixed targets. This lack of balance, and these soiled rather than interlinked or integrated policies, means that in practise housing targets will continue to drive Planning Officers to recommend inappropriate developments are approved, and over-development of the Borough will continue, to the detriment of the environment and against the wishes of local residents and local communities. This will continue in direct conflict with (weak) policies in The Local Plan on increasing biodiversity, protecting Local Open Space and addressing climate change.

CHAPTER SEVEN: GREEN AND BLUE INFRASTRUCTURE

Policies in this section are Not Sound. These policies should be embedded in relevant policy areas, rather than being siloed. There should be numerical targets for tree planting and allotment provision, built-in alongside housing targets. The Local Plan needs to state how increasing trees in the Borough help address the Climate Emergency as they store carbon, improve air quality and provide a buffer for traffic and construction noise and air pollution. The Local Plan needs to embed targets for allotment provision hand-in-hand with housing targets and developments of flats and high-rise tower blocks, rather than in a separate section. By creating these siloes of separate areas in The Local Plan, potential conflicts between different Policy areas mean that Green and Blue issues will be downgraded in priority, and this makes The Local Plan Not Sound.

POLICY GB1 - GREEN BELT AND METROPOLITAN OPEN LAND

TIS find this Policy to be weak and poorly defined, lacking in sufficient protection afforded to Green Belt and Metropolitan Open Land in the text box. Therefore this policy is Not Sound. At a time when we need increased and enhanced protection of green space and nature in what is rapidly becoming an over-developed London Borough, TIS object to any loss of green or 'grey'-belt land.

UK biodiversity commitments under the **Kunming Montreal biodiversity framework** (30% for nature by 2030) need to be taken into account across all policies, otherwise the Local Plan is Not Sound.

POLICY GB2 – LOCAL OPEN SPACE

TIS find the protection afforded to Local Open Space to be Not Sound.

The definition of what land is designated as Local Open Space in The Local Plan and why, needs to be clearly defined within The Local Plan.

The text box (pg 174) needs to state clearly that Local Open Space is protected and retained, as a primary policy, which sits above all other policies such as housing targets. This lack of clear hierarchy between the different policies contained within The Local Plan make the document Not Sound.

The suggested language looks to be unchanged from previous versions. TIS learned during two Public Inquiries held regarding planning applications to build multiple blocks of housing on the Park Road Allotment site in Isleworth. This language is not sufficient to prevent the Council's own Planning Officers recommending (twice) to Planning Committee that valued Local Open (Green) Space in a

Conservation area be destroyed. Retaining this language unchanged is Not Sound, leading to the risks, costs and investment of significant time and energy in subsequent Public Inquiries.

As part of Park Road public inquiry discussions, Planning Officers told TIS Committee members that they had no option but to recommend the developments, as “this is what The Local Plan said” with respect to housing targets, even though Planning Officers accepted that Hounslow had **exceeded its housing targets**, with thousands of new flats under construction in Brentford, a mile away from the site. In response to discussions with TIS Committee members, Councillors pledged (in writing) that this section of the Local Plan will be strengthened accordingly. TIS expected this version of The Local Plan to address these gaps in protection of our valued local community assets and local open space.

TIS expect this pledge to be honoured and respected, as such The Local Plan is Not Sound in this respect.

Lack of recognition of Asset of Community Value (ACV) designation in The Local Plan is Not Sound. ACV status is applied for by local communities and is assessed and decided on by the Council. As such ACV designation should be acknowledged in The Local Plan and should protect the designated Asset from **any change** considered by the community to be detrimental to the Asset as designated. The loop-hole where, providing an asset is not sold, there is no protection against development afforded by ACV status, needs to be closed by addressing this in The Local Plan.

POLICY GB5 - BLUE RIBBON NETWORK

The Policy says “*We will protect and enhance the borough’s Blue Ribbon Network, recognising the multifunctional role that rivers, canals and other waterbodies play and their potential to contribute to nature recovery and the borough’s regeneration.*”.

The associated text box gives no clear protection to river and tow path access for the public, this needs to be guaranteed and enshrined as part of, and stated as a high-level priority, across all development proposals. As such, the Local Plan is Not Sound. This is demonstrated by the plans for the Watermans Arts Centre development in Brentford. **The Local Plan is Not Sound as it does not enshrine river-side access** to the public in Hounslow to The River Thames, as well as local rivers such as River Crane (and canal-side tow path access as well). Local residents expect this access to be increased and enhanced to rivers and canals in the Borough, rather than removed.

POLICY GB7 – BIODIVERSITY

Clauses relating to Biodiversity Net Gain (BNG) are Not Sound. It is disappointing to see lack of biodiversity aspiration. TIS learnt at the Park Road Public Inquiry that The Local Plan should recognise that communities of species and habitats take many years to establish and as such, **protecting existing biodiversity should be given a higher weighting than off-setting BNG calculations** – which by definition are estimates and cannot be taken as guaranteed future benefits. Therefore this section of The Local Plan is Not Sound as currently drafted.

The Local Plan calls for the minimum 10% biodiversity net gain (BNG) requirement, as per the Environment Bill, in point H of policy GB7. In section 7.30, additional local policy requirements around Biodiversity Net Gain (BNG) are claimed, but on reviewing other documents, the additional local policy requirements are not specified.

BNG and in particular **protecting existing biodiversity, habitat and ecology** rather than moving BNG off-site, should be most strongly enforced and treated as non-negotiable. There should be no green-field development, and no developments on Local Open Space, green- or 'grey-' belt.

In brown-field and re-development of existing properties, TIS support an ambition for a BNG calculation well above 10%. As set out on the local government association website a BNG of 20% compared to 10% should be pursued in Hounslow. The Local Plan should recognise the importance of protecting and establishing 'green corridors'. Active green biodiversity/wildlife corridors or potential 'pocket park' locations need to be identified in The Local Plan. For example, reference should be made to Areas of Deficiency (AoD) in each Ward, to assess the importance of BNG to each proposed development. Land prioritised for pocket parks, community orchards, and local community growing and cultivation sites, are not mentioned in The Local Plan, except as "neighbourhood pocket green spaces" for Feltham on page 51, Policy P2(b).

TIS is concerned that the weighting of the Mayor's interim targets for Urban Greening Factor (UGF) (Table 8.2 in Policy G5) gives a high factor for green roofs which should be re-evaluated as this does not contribute to green infrastructure at ground level. This can leave the public realm space feeling built-up. A preference for ground-level greening solutions, and a strong weighting towards **keeping what green space is already existing**, should be clearly stated in The Local Plan if public and local environment are to benefit from the green new developments.

POLICY GB1 - GREEN BELT AND METROPOLITAN OPEN LAND

TIS oppose any loss of Green Belt land and find this section Not Sound. Compensatory biodiversity improvements due to Green Belt de-designating are stated in section 7.41 of GBI document and should be within The Local Plan **with a significantly greater weighting for the value of preserving existing habitat and nature, rather than off-setting, to prevent loss of local open green space.**

TIS do not accept that the exceptional circumstances for Green Belt release have been met and oppose the use of all Site Allocations for industrial use on the Green Belt. Including land at Hatton Fields (site 57). TIS find assumptions regarding extra employment for air freight in the vicinity of Heathrow Airport as Not Sound. The increase in air freight and aviation in general is not compatible with the Climate Emergency and 1.5C temperature targets. All references to Land at Hatton Fields in the Local Plan should be removed. This includes 2.58, 2.59, Policy P2(c), Policy ED1, 4.18 and in Appendix 2. For climate and environment reasons, TIS oppose Heathrow expansion in order to achieve lower climate emissions and protect existing local open green space.

In the Hanworth section of The Local Plan on page 67, TIS support a new clause:

"Opening up access to create a green corridor from the Crane Park alongside the A316 and in parallel with it. Extend this along the Longford River and thus up the Longford River to Hanworth Park to allow a route from the Crane Park to Hanworth Park for walking and wheeling".

POLICY GB8 - ALLOTMENTS, AGRICULTURE AND LOCAL FOOD GROWING

Policy GB8 states *"We will encourage the continued use of allotments and agricultural land, and promote new, innovative local food growing uses within green and other spaces, including community farming, gardening and orchards, as well as sustainable commercial food production where appropriate."*

Nothing in the associated text box states a clear commitment to increase Council allotment provision, with agreed targets, in each Ward, in the Borough. This should be enshrined as part of all development planning applications, that some proportion of each land be gifted to the Council to be run as Council Allotments. The long waiting lists, high demand for local Allotments, the increasing number of flats under construction without gardens, and the benefits of Allotments to local communities and physical and mental health make this section of the **Local Plan Not Sound**.

CHAPTER 8 – COMMUNITY INFRASTRUCTURE

POLICY SC1 – INCREASING HOUSING

TIS find this Policy Not Sound and oppose exceeding the London Plan target in the context of providing more housing in the Borough. The emphasis of the Local Plan needs to be towards ensuring that current housing is upgraded, and access to local open space and the environment is protected, and enhanced **rather than on targets and numbers for new housing**. TIS have heard Councillors stating that an algorithm calculates that (eg) tower blocks in Brentford need to be 17 stories high, while local Residents ask where their wishes are taken into consideration.

Bearing in mind it is currently 2024, a policy that the Borough should ‘meet and exceed a London Plan derived target of 1,782 homes per annum over the period 2020-2029’ is meaningless without the evidence of how many homes have already been delivered (or approved for development) since 2020 and this policy is therefore Not Sound.

Where is the evidence upon which The Local Plan can calculate the number of homes needed in Hounslow by 2041 (17 years from now) with such clear targets, of more than the **16,038 homes by 2029** with a target of a **minimum of 28,840 homes by 2041**. Without the evidence this policy is clearly Not Sound and these specific housing numbers make this policy Not Sound. Specific targets need to be removed from The Local Plan, to be replaced by the formula or calculation and the data source used, such that housing targets can be modified and publicised, set against actual numbers of housing approved, for example on a rolling basis every year in an open, transparent and evidence-based way. These detailed housing targets and numbers are in stark contrast to the lack of equivalent targets and numbers in policies affording environmental improvements, which is clearly Not Sound.

This is a reason that inappropriate, over-dense and high-rise developments are being recommended by Planning Officers, to the detriment of the quality of the environment, increased allotment provision and protection of local open space, **and this must be amended in The Local Plan for it to be Sound**. This section of The Local Plan needs to address and recognise existing evidence that Hounslow is already becoming over-developed, against the wishes of local residents and local communities, and needs to give clear links to show how the environmental policies elsewhere in The Local Plan are being built in to housing policies, with equivalent levels of targets and commitments.

Due to the lack of evidence presented to justify these numbers, these lines are Not Sound:

- The Local Plan ‘seeking to maximise the supply of housing in the borough’ will be in direct conflict with policies in The Local Plan which aim to increase biodiversity, protect Local Open Space and address climate change.
- A target of a ‘minimum of 28,840 homes by 2041’, the Local Plan stating the Borough will ‘meet and exceed our London Plan derived target of 1,782 homes per annum over the

period 2020-2029', and 'delivering more than the 16,038 homes ...by 2029'. It is not stated how and where these homes are needed, how numbers can be fixed so far into the future.

- The plan period (2029/30-2040/41) housing target to be 'set following the capacity-based approach set out in London Plan, and will deliver at least a further 12,000 homes, equivalent to 1,000 homes per annum'. This capacity-based approach needs to be explained in The Local Plan, why this approach will be valid over 11 years, in Hounslow is not made clear.
- *New opportunities to augment this growth where new infrastructure investment creates opportunities for levels of growth previously found to be unsustainable.* This statement is not clear, looks like a 'back-door' into increasing development on the back of other developments and needs to be removed.

POLICY SC3 - MEETING THE NEED FOR A MIX OF HOUSING SIZE AND TYPE

"Seeking a mix of new housing to meet evidenced local need, based on the latest and/or most specific available evidence, and applying the general housing need mix requirements set out in the latest Housing Needs Assessment"

The lack of information on how this evidence will be obtained and how local residents will be engaged in this process makes The Local Plan Not Sound. For example, to deliver affordable smaller family houses with gardens, rather than more high-rise luxury flats, based on evidence of the needs and preferences of Residents and local communities, rather than to maximise profits for property developers.

Delivering what people want, rather than what makes most profit to developers should be the stated aim of the Local Plan. This is essential before Hounslow can contemplate increasing the amount of new development as currently being proposed under The Local Plan.

POLICY SC2 - MAXIMISING THE PROVISION OF AFFORDABLE HOUSING

TIS finds lack of protection to increasing real affordable housing in The Local Plan to be Not Sound.

"Applicants will be required to provide affordable housing that fully contributes to achieving the Mayor's strategic target of 50%, as set out in London Plan Policy H4. Where applicable, for qualifying schemes, the Fast Track route of the threshold approach will be applied in line with London Plan Policy H5." Please include what is the London Plan H5 in The Local Plan.

That property developers can renege on all their commitments to affordable housing if their profits are deemed to have decreased, make this section of The Local Plan Not Sound. **The Local Plan needs to clearly state the removal of this opt-out to become Sound.**

In addition lack of transparency to Hounslow residents on number of housing units delivered compared to the number (and therefore percentage) of affordable housing units actually delivered (and what exactly 'affordable' means in terms of actual costs to occupants) through housing developments approved by the Council, makes this policy section Not Sound.

Para 2.16 is Not Sound as the evidence sources for delivering this is not included nor is the associated **Housing Delivery Strategy** which is essential to understand this. It states that:

Over the plan period there is a significant 'step change' in housing delivery compared to previous targets. A housing delivery strategy will ensure this will be achieved and maintained to ensure continuous supply of housing development opportunities, together with an ambitious programme of delivery of additional affordable homes and specialist independent and non-independent supported

living. A broad mixture of housing types and tenures will be achieved to meet the needs and aspirations of local people, including well-designed HMO accommodation in suitable locations, affordable and intermediate tenures, and for market rent and purchase at a range of price points and across the geography of the borough. Affordable housing will be sought on all sites proposing 10 or more homes, aligning with the London Plan strategic target of 50% affordable housing and 35% affordable housing where applications follow the London Plan's Fast Track route of the threshold approach to affordable housing delivery. Social rented housing will be prioritised within the affordable rented housing tenure, reflective of the Council's evidence for local housing needs. New homes will comply with London-wide minimum space and accessibility standards and with specific additional requirements for external private amenity space to ensure that our housing continues to offer the best aspects of suburban amenities that local people want.

The Local Plan needs to have a clear target for the total number of social rented homes actually delivered over the plan period. This is more important than total home building or buying targets. Policy SC1 states "no reduction in the number of social rented homes". However 5.17 of SC2 is not explicit about the percentage of social rented homes, but says the 70% of social rent / affordable housing, priority will be delivery of social rent. Section 5.12 mentions council house building programme and purchase. The London Mayor manifesto is also ambitious in building council homes. TIS finds Not Sound that Hounslow Council will have no more total social rented housing stock in Hounslow in 2022 than in 2010. This is due to the attrition of right to buy and demolition, despite clear ambition in the corporate plan to build 1,000 council homes and buy 1,000 social rented homes from 2022 to 2026.

Despite current social rented housing build and buy programme being the largest Hounslow Council capital investment in the period 2022 to 2026, there is no mention of a capital programme in the Infrastructure Development Plan to fund the Council housing programme.

CHAPTER 9 – ENVIRONMENTAL QUALITY

POLICY EQ1 - ENERGY AND CARBON REDUCTION

We will make radical progress towards becoming a net zero carbon borough, by minimising the demand for energy and promoting renewable and low carbon technologies within new development.

TIS find this policy Not Sound as this needs to be embedded in all policy sections rather than a sperate policy. In addition, it primarily covers new development proposals. The challenge in carbon reduction in the plan period is existing buildings in the Borough, and all the recently built or already approved significant new developments, which have not incorporated local energy production, water catchment, use of brown water, or other climate-related adaptations.

Climate is not well addressed in the Local Plan and is siloed rather than integrated. In section 9.2 it proposes to put a plan to address the Climate Emergency for existing buildings into a subsequent document (a Hounslow Local Energy Plan). **This makes the Local Plan Not Sound** by not giving adequate coverage to the approach to be taken to 2041. There needs to be local evidence for energy use in the evidence base, before the Local Plan can be considered to be sound.

The West London Local Area Energy Plan highlights issues including inadequate electricity network, the level of local retrofit, focus on local energy generation, how heat is to be supplied, the large increase in electric vehicles and increase in data centres. **This Local Plan is Not Sound** as how these

challenges will be addressed and how new developments and existing housing stock may compound the problems, rather than ease the transition to a zero carbon Hounslow.

The Local Plan does not give electricity the prominence it deserves and this is therefore Not Sound. Both the Infrastructure Delivery Plan in the evidence base and the West London Local Energy Plan (not in the evidence base) describe the challenges that confronts Hounslow with providing electricity in Hounslow, with the existing significant expansion in population and electric vehicles, over the plan period, even without any new housing developments. This consideration needs to be incorporated and recognised in the housing targets section of The Local Plan rather than as a separate policy.

POLICY EC2 – DEVELOPING A SUSTAINABLE TRANSPORT NETWORK

TIS find The Local Plan Not Sound with respect to sustainable travel as this policy needs to be embedded across all relevant policy areas rather than a separate policy section.

“We will secure a more sustainable local travel network that maximises opportunities for walking, cycling and using public transport, reduces congestion, improves the public realm, facilitates carbon reduction and air quality improvement and improves health and well-being.”

Cycle use and bike parking should be prioritised to enable more people to use this mode of transport. Policy EC2 point D is too vague stating that “the council may seek a higher provision in certain circumstances” above the minimum standard stated in the London Plan.

The minimum car park allocation for dwellings is calculated as one car park space for a 1 bedroom dwelling and two spaces for any larger dwelling. The reality that many homes in Hounslow own at least one car needs to be taken into consideration, with sufficient car parking, and safe electric car and bike charging points established in car parking places, to help avoid the dangers of charging e-bike and e-scooter batteries indoors (known to be a significant fire-risk in London). A household may own as many bicycles as people, and provision seems inadequate for cycling to become a choice of transportation for more people. Cycling parking and safe charging of all e-vehicles in Hounslow needs to be prioritised and not dependent on provision in individual planning submissions.

POLICY EQ5 – NOISE

TIS wish to see in The Local Plan a limit on Heathrow night flights from 10pm to 7am. These are harmful to the health of Hounslow residents. The harm of air flights to local residents and the Climate outweigh the benefits. There should be fewer flights to and from Heathrow including for freight. The Hounslow local plan should plan to improve the lives of current residents living under the flight paths and seek reductions in flights to become Sound.

CHAPTER 6 – CONTEXT AND CHARACTER, Policies CC1-CC6

The Site allocations document has proposals for specific sites in the Borough. This section makes proposals to change this, not addressed in previous sections of this response.

Site 118: Former GSK Site. This site was built quite recently and has interesting buildings and spaces. The site allocation document needs to be clearer that there should be proposed uses that will

demolish as little as possible. There is a real opportunity to increase green space by extending Boston Mannor Park and the Canal tow path into the GSK site. The private company undertaking a 'consultation' on the future of this key site has restricted access such that key local organisations such as TIS and Brentford Voice have been rejected from the consultation, despite application to join sessions. Effort should be made to re-use existing buildings, including retaining the internal 'Street area' for local small shops. The Local Plan could specify how much green space, allotment sites, community orchard space, mixed with possible residential, business and industrial are mixed in the development (minimum development quantum). This should be added so that it is clear.

Site 32. Brentford Fountain Leisure Centre. This entry is worded in such a way as to give little reassurance that it will continue as a leisure centre. This entry is missing the normal "Minimum Development Quantum" that would determine how much of the site is to be used for each purpose. So the way it is worded could mean that the whole site is converted to residential with no leisure at all. This site should not be demolished, but should be retrofitted and maintained properly by the Council. This site was built relatively recently. TIS just cannot accept The Local Plan approach that so many buildings in the borough are being demolished when under 40 years old due to being poorly maintained. £35 million is allocated to this site- this could be used to refurbish the current building.

Site 110 Albany Riverside. This site was built relatively recently and should not be demolished. It should be refurbished. The riverside setting is a great place for a public building like the Watermans Arts Centre. The Local Plan should be aiming to restore this site as an arts centre, mosque and other artisan use as soon as possible. It should not be taken away from the public for 190 private flats. The current low profile building is a good fit for the World Heritage Centre of Kew Gardens across the river. The IDP has £60 million allocated to this, of which only £10 million is anticipated from Hounslow council. This leaves a funding gap of £50 million. It does not appear that the funding gap will be filled any time soon by property deals. The £10 million anticipated LBH funding should be used to refurbish the existing site and get new management in as suggested by local groups such as Brentford Arts Works.

Site 101 Brentford Group Practice. This building is relatively new and should not be demolished. This should be made clear and it is proposed to be developed as soon as 2026. TIS need assurance that it does not risk losing the character of local buildings nor the health centre temporarily or permanently.

TIS also seek reassurances about continuity of service for the Watermans Arts Centre as we understand this has not been met. Continuity of service should be enshrined in the Local Plan by including this in the Site requirements. £17 million is allocated to this. Some of this can be used to refurbish the medical centre rather than demolish it.

Site 28: - 27 Great West Road. These are issues with regard to air pollution, noise, biodiversity and carbon impacts. The planning request is for over 900 homes, whereas the proposed residential units is 500 homes. Site allocations should be clear not just on "minimum development quantum" but maximum as well to limit the site to far less than 900 homes.

Site 119 Convent Way Estate. It looks like this is another case of proposing to knock down relatively recently built buildings. This site should be refurbished rather than demolished and rebuilt.